

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

KEITH A. WILLIAMS	)	
	)	
COMPLAINANT	)	
	)	
v.	)	CASE NO. 98-620
	)	
COLUMBIA GAS OF KENTUCKY, INC.	)	
	)	
DEFENDANT	)	

ORDER TO SATISFY OR ANSWER

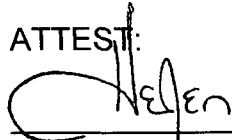
Columbia Gas of Kentucky, Inc. ("Columbia Gas") is hereby notified that it has been named as defendant in a formal complaint filed on November 30, 1998, a copy of which is attached hereto.

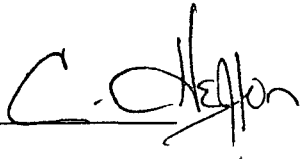
Pursuant to 807 KAR 5:001, Section 12, Columbia Gas is HEREBY ORDERED to satisfy the matters complained of or file a written answer to the complaint within 10 days from the date of service of this Order.

Should documents of any kind be filed with the Commission in the course of this proceeding, the documents shall also be served on all parties of record.


Done at Frankfort, Kentucky, this 3rd day of December, 1998.

ATTEST:

  
Executive Director



PUBLIC SERVICE COMMISSION

  
Chairman

  
Vice Chairman

  
Commissioner

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the matter of:

Keith A. Williams

\_\_\_\_\_  
(Your Full Name)

COMPLAINANT

VS.

Columbia Gas of Ky., Inc.

\_\_\_\_\_  
(Name of Utility)

DEFENDANT

NO. 98-620

COMPLAINT

Keith A. Williams

The complaint of \_\_\_\_\_ respectfully shows:

(Your Full Name)

KEITH A. WILLIAMS

(a)

\_\_\_\_\_  
(Your Full Name)

600 SOUTH MILL ST., LEXINGTON, KY 40508

\_\_\_\_\_  
(Your Address)

COLUMBIA GAS OF KY, INC.

(b)

\_\_\_\_\_  
(Name of Utility)

P.O. BOX 14241, LEXINGTON, KY 40512  
(2001 MERCER ROAD, LEX.)

\_\_\_\_\_  
(Address of Utility)

(COMPLAINT IS STATED ON ADDITIONAL SHEET)

(c)

That:

\_\_\_\_\_  
(Describe here, attaching additional sheets if necessary,

\_\_\_\_\_  
the specific act, fully and clearly, or facts that are the reason

\_\_\_\_\_  
and basis for the complaint.)

Continued on Next Page

The \$65.00 reconnect charge burdens unfairly those customers who do not need natural gas year around; this charge, which recoups eight months of minimum charges, is used as a coercion to discourage seasonal use of gas. This practice is not ethical and gives the company too much priority over individual consumer right. This <sup>PSC-</sup>permitted use of the reconnect charge must be changed to correct these conditions.

Originally, the reconnect charge was applied to those customers who could not pay their monthly bills, whose service had to be disconnected then reconnected by the company. That is the only legitimate use of the reconnect charge, and should again be limited to such cases.

However, the utility company also uses the reconnect charge to discourage and prevent seasonal use of gas. This is unethical, especially for low and fixed income persons. A seasonal customer who in good standing voluntarily terminates his gas service in the spring should be considered a new customer when he applies for service in the fall, and a new customer is not charged to have service connected. Seasonal use is a natural risk of the business, for which the customer is not at fault and is not responsible. Even though the company is a limited monopoly, the company is not entitled to support from persons who do not need their service. It does not matter that the company made an investment or has upkeep, because every business must make an investment and have expenses, and this must be recovered from actual use customers. Changing this use of the reconnect charge would not threaten the company's ability to operate.

Seasonal use status must be allowed to any customer once a year without penalty. Any vital loss to the company would have to be redistributed to the actual remaining customers, if necessary. However, the company might absorb this loss without any significant decrease in their profit percentage, without redistributing the MMC. There should be no readjustment until the loss exceeds one percent of their total profit for the year. Under present conditions where funds are provided for unfortunate customers who cannot pay their monthly bills, the reconnect charge may now be used solely against seasonal customers. If the redistribution is made, the \$2.18 gas delivery charge should be removed from the MMC. That is a good idea, anyway.

If 1,000 customers elect seasonal use for an average of 6 months, the loss would be 4860.00; when redistributed to 50,000 remaining customers over 6 months, the share equals just \$00.0162 per month. Columbia Gas of Ky. has approximately 130,000 customers.

Under the present system, the customer is denied freedom to choose and is forced to pay for service he does not need or receive. Even though the company has made an investment, there is a basic wrong in this concept. It is easy for a monopoly to force itself on people in the interest of profit--and that is what Columbia Gas does at present. I hereby ask the PSC to redress this matter.

K.A.W.

Formal Complaint

KEITH A. WILLIAMS

vs.

COLUMBIA GAS OF KY, INC.

Page 2 of 2

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Wherefore, complainant asks THE PUBLIC SERVICE COMMISSION OF THE STATE OF  
(Specifically state the relief desired.)

KENTUCKY TO REVOLK AND DENY USE OF THE RECONNECT CHARGE AS SET FORTH  
AND QUALIFIED IN THIS COMPLAINT, AND TO GRANT ANY OTHER RELIEF TO WHICH  
THE SEASONAL CUSTOMER AND THE UNDERSIGNED MAY BE ENTITLED.

Dated at Lexington, Kentucky, this 24th day  
(Your City)

of November, 1998.  
(Month)

Keith A. Williams

(Your Signature)

(Name and address of attorney, if any)